

**UNITED STATES DISTRICT COURT  
FOR THE DISTRICT OF MASSACHUSETTS**

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JOSE PINEDA, JOSE MONTENEGRO, MARCO  
LOPEZ, and JOSE HERNANDEZ on behalf of  
themselves and all others similarly situated,

Plaintiffs

v.

SKINNER SERVICES, INC. d/b/a SKINNER  
DEMOLITION, THOMAS SKINNER, DAVID  
SKINNER, ELBER DINIZ and SANDRO SANTOS

Defendants.

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C.A. No. 1:16-cv-12217

**DEFENDANTS' OBJECTIONS TO PLAINTIFFS' PROPOSED WITNESSES**

Pursuant to Fed. R. Civ. P. 26(a)(3) and Local Rule 16.5, the Defendants hereby assert  
the following objections to the Plaintiffs' proposed trial witnesses:

<u>Witness</u>	<u>Objections</u>
Jose Pineda	No objections.
Jose Montenegro	No objections.
Marco Lopez	No objections.
Jose Hernandez	No objections.
David Aguilar	No objections.
Brijido Alvarez	No objections.
Wilfredo Arocho	No objections.
Andre Atkins	FRE 401-402 Relevance FRE 602- Foundation/Pers. Knowledge
Luis Benitez	No objections.
Carlos Bermudez Glean	No objections.
Juan Cante	No objections.
Ricardo Cante	No objections.
Vidal Cante	No objections.
Richard Capo	No objections.
Frowilan Chacaj	No objections.
Gustavo Coconubo	No objections.
Selvin Contreras	No objections.
Pedro Cordero Soto	No objections.
Noe Cosigua	No objections.

Hesbin Cruz	No objections.
William Cruz	No objections.
Charles Dos Santos	No objections.
Abelino Escobar	No objections.
Vanildo Fernandez	No objections.
Cesar Fortes	No objections.
Dieusel Francis	No objections.
David Frazier	No objections.
Marcos Garcia	No objections.
Cesar Gomes	No objections.
Manuel Goncalves	No objections.
Douglas Henriquez	No objections.
Angel Hernandez	No objections.
Jermone Hodge	No objections.
Martin Lagunes	No objections.
Erick Lopez	No objections.
Jose Lopez	No objections.
Marco A. Lopez	No objections.
Juan Marroquin Vasquez	No objections.
Marco Mendez	No objections.
Joao Miranda	No objections.
Edgar Molina	No objections.
Carlos Morataya	No objections.
Gregg Natale	No objections.

Jefry Ochoa	No objections.
Melvin Ochoa	No objections.
Dwayne Paisely	No objections.
Argelio Pedrosa	No objections.
Ruben Pedroza	No objections.
Cristian Perez	No objections.
Elder Antonio Ochoa Pineda	No objections.
Carlos Sosa	No objections.
Kevyn B. Tavares	No objections.
Dayshaun Thompson	No objections.
Mario Valenzuela	No objections.
Luis Nunes Velasquez	No objections.
Elmer Veliz	No objections.
Jose Vicente	No objections.
Marconio Pinto	No objections.
Manuel Teixeira	No objections.
Pedro Rodrigues	No objections.
Temi Murray	No objections.
Jon Shocket	No objections.
Michael Drake	No objections.
Kalvin Rodriguez	No objections.
Michelle Forrester	No objections.
Tyla Skinner	FRE 401-402 Relevance FRE 602-Foundation/Pers. Knowledge

Patsy Sperduto	FRE 401-402 Relevance FRE 403-Unfair Prejudice, confusing, misleading, needless presentation, etc. FRE 404 – Char. Evid. FRE 602- Foundation/Pers. Knowledge FRE 609 – Improper Impeachment
Chris Van	FRE 401-402 Relevance FRE 602- Foundation/Pers. Knowledge
David Breshears	FRE 401-402 Relevance FRE 403-Unfair Prejudice, confusing, misleading, needless presentation, etc. FRE-702-703  <u>Daubert</u> objections.

Respectfully submitted,

**SKINNER SERVICES, INC., d/b/a  
SKINNER DEMOLITION,  
THOMAS SKINNER, DAVID  
SKINNER, ELBER DINIZ and  
SANDRO SANTOS,**  
By their attorneys,

/s/ Michael B. Cole  
Gregory J. Aceto (BBO# 558556)  
aceto@acetolegal.com  
Michael B. Cole (BBO# 679596)  
mcole@acetolegal.com  
**ACETO, BONNER & COLE, P.C.**  
One Liberty Square, Suite 410  
Boston, MA 02109  
(617) 728-0888

Dated: January 12, 2021.

**CERTIFICATE OF SERVICE**

I hereby certify that a copy of the foregoing document was filed electronically and served by mail on anyone unable to accept electronic filing. Notice of this filing will be sent by email to all parties by operation of the court's electronic filing system or by mail to anyone not able to accept electronic filing as indicated on the Notice of Electronic Filing. Parties may access this filing through the court's CM/ECF System.

/s/ Michael B. Cole

Michael B. Cole (BBO No. 679596)

mcole@acetolegal.com

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Defendants.

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C.A. No. 1:16-cv-12217

**DEFENDANTS' OBJECTIONS TO PLAINTIFFS' PROPOSED FACT WITNESSES  
WHOSE TESTIMONY MAY BE PRESENTED BY DEPOSITION**

Pursuant to Fed. R. Civ. P. 26(a)(3) and Local Rule 16.5, the Defendants hereby assert the following objections to the Plaintiffs' proposed fact witnesses whose testimony may be presented by deposition:

<u>Witness</u>	<u>Objections</u>
Thomas Skinner (Individually and as 30(b)(6) Representative)	FRCP 32 FRE 801-802 Hearsay FRE 401-402 Relevance Reserve the right to further object upon receipt of proposed Deposition Transcript.
David Skinner	FRCP 32 FRE 801-802 Hearsay FRE 401-402 Relevance Reserve the right to further object upon receipt of proposed Deposition Transcript.
Sandros Santos	FRCP 32 FRE 801-802 Hearsay FRE 401-402 Relevance Reserve the right to further object upon receipt of proposed Deposition Transcript.
Elber Diniz	FRCP 32 FRE 801-802 Hearsay FRE 401-402 Relevance Reserve the right to further object upon receipt of proposed Deposition Transcript.
Ubirata Ferreira	FRCP 32 FRE 801-802 Hearsay FRE 401-402 Relevance Reserve the right to further object upon receipt of proposed Deposition Transcript.
Brian Fitzgerald	FRCP 32 FRE 801-802 Hearsay FRE 401-402 Relevance



	Reserve the right to further object upon receipt of proposed Deposition Transcript.
Edlei V. Gomes	FRCP 32 FRE 801-802 Hearsay FRE 401-402 Relevance Reserve the right to further object upon receipt of proposed Deposition Transcript.

Respectfully submitted,

**SKINNER SERVICES, INC., d/b/a  
SKINNER DEMOLITION,  
THOMAS SKINNER, DAVID  
SKINNER, ELBER DINIZ and  
SANDRO SANTOS,**  
By their attorneys,

/s/ Michael B. Cole  
Gregory J. Aceto (BBO# 558556)  
aceto@acetolegal.com  
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/s/ Michael B. Cole

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Defendants.

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C.A. No. 1:16-cv-12217

**DEFENDANTS' OBJECTIONS TO PLAINTIFFS' PROPOSED EXHIBITS**

Pursuant to Fed. R. Civ. P. 26(a)(3) and Local Rule 16.5, the Defendants hereby assert  
the following objections to the Plaintiffs' proposed trial exhibits:

<u>Plaintiffs’ Proposed Exhibit #</u>	<u>Description</u>	<u>Objections</u>
1.	February 26, 2016, Memorandum from Tom Skinner to Demolition Employees. SK000414-000415.	No objections.
2.	September 25, 2015, Memorandum from Dave Skinner to all employees of Skinner Services Inc. SK000412.	FRE 801-802 Hearsay FRE 901-Lack of Auth. FRE 401-402 Relevance
3.	December 13, 2013, Memorandum from David Skinner to All Employees. SK000031.	FRE 801-802 Hearsay FRE 901-Lack of Auth. FRE 401-402 Relevance
4.	December 02, 2011, Memorandum to All Skinner Demo Employees. SK004754.	FRE 801-802 Hearsay FRE 901-Lack of Auth. FRE 401-402 Relevance
5.	Cintas Rental Program – Skinner Demolition Employee Forms. SK004096-004141.	No objections.
6.	2013-2014 paper timekeeping and payroll records. SK0001547-4095.	No objections.
7.	Employee Earnings Record Jan-Dec 2014. SK000424-000545.	No objections.
8.	ADP Earnings Jan-June 2015. SK000546-000988.	No objections.
9.	ADP Earnings Jul-Dec 2015. SK000989-001084.	No objections.
10.	Employee Earnings Record Jan 2016-April 2017. SK001085-001420.	No objections.

11.	Employee Earnings Record April 2017-July 2017. SK1421-1546.	No objections.
12.	Manual Time Adjustments TimeStation Report. SK004284.	FRE 801-802 Hearsay FRE 901-Lack of Auth. FRE 401-402 Relevance  Reserve the right to further object upon receipt of proposed exhibit.
13.	Employee Activity TimeStation Report. SK004277.	No objections.
14.	Skinner Google Calendars. SK5148-5552.	No objections.
15.	Skinner SmartSheets Calendars. SK000262-000401, SK4142-4231.	No objections.
16.	Phone Records Produced by Verizon Wireless.	FRE 801-802 Hearsay FRE 901-Lack of Auth. FRE 401-402 Relevance  Reserve the right to further object upon receipt of proposed exhibit.
17.	Declarations of Skinner Services Employees. Dkt. Nos. 50-2, 57.	FRE 801-802 Hearsay FRE 901-Lack of Auth. FRE 401-402 Relevance FRE 404 – Char. Evid.  Reserve the right to further object upon receipt of proposed exhibit.
18.	Report of David Breshears Dkt. No. 326-48.	FRE 801-802 Hearsay FRE 403-Unfair Prejudice, confusing, misleading, needless presentation, etc. FRE-702-703  <u>Daubert</u> objections.
19.	Documents relied upon by David Breshears in preparing his Report, listed at Dkt. No. 326-48, 54-56.	FRE 801-802 Hearsay FRE 901- Auth FRE 602-Foundation/Pers. Knowledge FRE 403-Unfair Prejudice, confusing, misleading, needless presentation, etc.

		<p>FRE-702-703</p> <p><u>Daubert</u> objections.</p> <p>Reserve the right to further object upon receipt of proposed exhibit.</p>
20.	Skinner Demolition “About Us” Page as of October 30, 2017. Dkt. No. 326-11.	<p>FRE 801-802 Hearsay FRE 401-402 Relevance FRE 901- Auth</p> <p>Reserve the right to further object upon receipt of proposed exhibit.</p>
21.	Skinner Demolition “About Us” Page as of December 11, 2017. Plaintiff’s Depo. Ex. 24.	<p>FRE 801-802 Hearsay FRE 401-402 Relevance FRE 901- Auth</p> <p>Reserve the right to further object upon receipt of proposed exhibit.</p>
22.	Skinner Disposal “About Us” Page as of December 11, 2017. Plaintiff’s Depo. Ex. 25.	<p>FRE 801-802 Hearsay FRE 401-402 Relevance FRE 901- Auth</p> <p>Reserve the right to further object upon receipt of proposed exhibit.</p>
23.	Skinner Demo LinkedIn page as of February 28, 2018. Dkt No. 326-12.	<p>FRE 801-802 Hearsay FRE 401-402 Relevance FRE 901- Auth</p> <p>Reserve the right to further object upon receipt of proposed exhibit.</p>
24.	David Skinner Facebook page as of January 17, 2018. Dkt. No. 326-14.	<p>FRE 801-802 Hearsay FRE 401-402 Relevance FRE 901- Auth</p> <p>Reserve the right to further object upon receipt of proposed exhibit.</p>
25.	Skinner Demo Facebook page as of October 30, 2017. Plaintiff’s Depo. Ex. 38.	<p>FRE 801-802 Hearsay FRE 401-402 Relevance FRE 901- Auth</p>

		Reserve the right to further object upon receipt of proposed exhibit.
26.	Skinner Consulting Inc. Secretary of State Business Entry Summary as of October 16, 2019. Dkt. No. 326-23.	FRE 801-802 Hearsay FRE 401-402 Relevance FRE 901- Auth  Reserve the right to further object upon receipt of proposed exhibit.
27.	Skinner Services Inc. Secretary of State Business Entry Summary as of October 16, 2019. Dkt. No. 326-49.	FRE 801-802 Hearsay FRE 401-402 Relevance FRE 901- Auth  Reserve the right to further object upon receipt of proposed exhibit.
28.	Skinner Services, LLC Secretary of State Business Entry Summary as of October 16, 2019. Dkt. No. 326-50.	FRE 801-802 Hearsay FRE 401-402 Relevance FRE 901- Auth FRE 403-Unfair Prejudice, confusing, misleading, needless presentation, etc.  Reserve the right to further object upon receipt of proposed exhibit.
29.	Asset Purchase Agreement between JAW Waste Services, Inc. and Skinner Services, LLC.	FRE 801-802 Hearsay FRE 401-402 Relevance FRE 901- Auth FRE 403-Unfair Prejudice, confusing, misleading, needless presentation, etc.  Reserve the right to further object upon receipt of proposed exhibit.
30.	155 Shakedown Street LLC Secretary of State Business Entry Summary as of October 16, 2019. Dkt. No. 326-51.	FRE 801-802 Hearsay FRE 401-402 Relevance FRE 901- Auth FRE 403-Unfair Prejudice, confusing, misleading, needless presentation, etc.

		Reserve the right to further object upon receipt of proposed exhibit.
31.	Affidavit of David Skinner filed in the Whitney matter on February 28, 2014. Dkt. No. 344-7.	<p>FRE 801-802 Hearsay  FRE 401-402 Relevance  FRE 403-Unfair Prejudice, confusing, misleading, needless presentation, etc.</p> <p>Reserve the right to further object upon receipt of proposed exhibit.</p>
32.	Declaration of Thomas Skinner dated August 18, 2018. Dkt. No. 50-1.	<p>FRE 801-802 Hearsay  FRE 401-402 Relevance</p> <p>Reserve the right to further object upon receipt of proposed exhibit.</p>
33.	Affidavit of Patsy Sperduto dated July 29, 2019. Dkt. No. 326-25.	<p>FRE 801-802 Hearsay  FRE 401-402 Relevance  FRE 901- Auth  FRE 403-Unfair Prejudice, confusing, misleading, needless presentation, etc.  FRE 602-Foundation/Pers. Knowledge</p> <p>Reserve the right to further object upon receipt of proposed exhibit.</p>
34.	Affidavit of Patsy Sperduto dated September 3, 2019. Dkt. No. 326-27.	<p>FRE 801-802 Hearsay  FRE 401-402 Relevance  FRE 901- Auth  FRE 403-Unfair Prejudice, confusing, misleading, needless presentation, etc.  FRE 602-Foundation/Pers. Knowledge</p> <p>Reserve the right to further object upon receipt of proposed exhibit.</p>



35.	Affidavit of Laura A. O'Toole dated August 27, 2019. Dkt. No. 326-28.	FRE 801-802 Hearsay FRE 401-402 Relevance FRE 901- Auth FRE 403-Unfair Prejudice, confusing, misleading, needless presentation, etc. FRE 602-Foundation/Pers. Knowledge
36.	Declaration of Sandro Santos dated November 13, 2019. Dkt. No. 344-1.	FRE 801-802 Hearsay FRE 401-402 Relevance  Reserve the right to further object upon receipt of proposed exhibit.
37.	Declaration of David Skinner dated November 13, 2019. Dkt. No. 344-2.	FRE 801-802 Hearsay FRE 401-402 Relevance  Reserve the right to further object upon receipt of proposed exhibit.
38.	Declaration of Thomas Skinner dated November 15, 2019. Dkt. No. 344-12.	FRE 801-802 Hearsay FRE 401-402 Relevance  Reserve the right to further object upon receipt of proposed exhibit.
39.	Transcript of the November 28, 2017, deposition of Thomas Skinner.	FRCP 32  FRE 801-802 Hearsay FRE 401-402 Relevance  Reserve the right to further object upon receipt of proposed exhibit.
40.	Transcript of the September 20, 2018, deposition of Thomas Skinner as 30(b)(6) Representative.	FRCP 32  FRE 801-802 Hearsay FRE 401-402 Relevance  Reserve the right to further object upon receipt of proposed exhibit.
41.	Transcript of the March 5, 2018, deposition of David Skinner.	FRCP 32  FRE 801-802 Hearsay FRE 401-402 Relevance

		Reserve the right to further object upon receipt of proposed exhibit.
42.	Transcript of the January 19, 2018, deposition of Sandro Santos.	FRCP 32 FRE 801-802 Hearsay FRE 401-402 Relevance Reserve the right to further object upon receipt of proposed exhibit.
43.	Transcript of the December 12, 2017, and March 26, 2018, deposition of Elber Diniz.	FRCP 32 FRE 801-802 Hearsay FRE 401-402 Relevance Reserve the right to further object upon receipt of proposed exhibit.
44.	Transcript of the March 20 and 28, 2018, deposition of Edlei Gomes.	FRCP 32 FRE 801-802 Hearsay FRE 401-402 Relevance Reserve the right to further object upon receipt of proposed exhibit.
45.	Transcript of the December 7, 2017, deposition of Ubirata Ferreira.	FRCP 32 FRE 801-802 Hearsay FRE 401-402 Relevance Reserve the right to further object upon receipt of proposed exhibit.
46.	Transcript of the October 30, 2018, deposition of Brian Fitzgerald.	FRCP 32 FRE 801-802 Hearsay FRE 401-402 Relevance Reserve the right to further object upon receipt of proposed exhibit.
47.	Transcript of the June 29, 2018, deposition of Manuel Goncalves.	FRCP 32 FRE 801-802 Hearsay FRE 401-402 Relevance

		Reserve the right to further object upon receipt of proposed exhibit.
48.	Transcript of the August 24, 2018, deposition of Cesar Fortes.	FRCP 32 FRE 801-802 Hearsay FRE 401-402 Relevance Reserve the right to further object upon receipt of proposed exhibit.
49.	Transcript of the August 23, 2018, deposition of Richard Capo.	FRCP 32 FRE 801-802 Hearsay FRE 401-402 Relevance Reserve the right to further object upon receipt of proposed exhibit.
50.	Transcript of the July 9, 2018, deposition of Gustavo Coconubo.	FRCP 32 FRE 801-802 Hearsay FRE 401-402 Relevance Reserve the right to further object upon receipt of proposed exhibit.
51.	Transcript of the August 28, 2018, deposition of David Frazier.	FRCP 32 FRE 801-802 Hearsay FRE 401-402 Relevance Reserve the right to further object upon receipt of proposed exhibit.
52.	Transcript of the December 5, 2017, and June 12, 2018, deposition of Jose Pineda.	FRCP 32 FRE 801-802 Hearsay FRE 401-402 Relevance Reserve the right to further object upon receipt of proposed exhibit.
53.	Transcript of the June 22, 2018, deposition of Jose Vicente.	FRCP 32 FRE 801-802 Hearsay FRE 401-402 Relevance

		Reserve the right to further object upon receipt of proposed exhibit.
54.	Transcript of the June 8, 2018, deposition of Dieusel Frances.	FRCP 32 FRE 801-802 Hearsay FRE 401-402 Relevance Reserve the right to further object upon receipt of proposed exhibit.
55.	Transcript of the January 23, 2018, deposition of Jose Hernandez.	FRCP 32 FRE 801-802 Hearsay FRE 401-402 Relevance Reserve the right to further object upon receipt of proposed exhibit.
56.	Transcript of the December 14, 2017, deposition of Marco Lopez.	FRCP 32 FRE 801-802 Hearsay FRE 401-402 Relevance Reserve the right to further object upon receipt of proposed exhibit.
57.	Transcript of the June 21, 2018, deposition of Juan Vasquez.	FRCP 32 FRE 801-802 Hearsay FRE 401-402 Relevance Reserve the right to further object upon receipt of proposed exhibit.
58.	Transcript of the June 9, 2018, deposition of Marco Mendez.	FRCP 32 FRE 801-802 Hearsay FRE 401-402 Relevance Reserve the right to further object upon receipt of proposed exhibit.
59.	Transcript of the November 20, 2017, deposition of Jose Montenegro.	FRCP 32 FRE 801-802 Hearsay FRE 401-402 Relevance

		Reserve the right to further object upon receipt of proposed exhibit.
60.	Transcript of the Contempt Hearing held on October 26, 2018, November 7, 2018, and November 13, 2018.	FRE 801-802 Hearsay FRE 401-402 Relevance FRE 404 – Char. Evid. FRE 403-Unfair Prejudice, confusing, misleading, needless presentation, etc.  Reserve the right to further object upon receipt of proposed exhibit.
61.	Termination Notice from Michelle Forrester to Manuel Goncalves, August 24, 2018.	FRE 801-802 Hearsay FRE 401-402 Relevance FRE 403-Unfair Prejudice, confusing, misleading, needless presentation, etc. FRE 404 – Char. Evid.  Reserve the right to further object upon receipt of proposed exhibit.
62.	Memo regarding Manuel Goncalves by Michelle Forrester, August 24, 2018.	FRE 801-802 Hearsay FRE 401-402 Relevance FRE 403-Unfair Prejudice, confusing, misleading, needless presentation, etc. FRE 404 – Char. Evid.  Reserve the right to further object upon receipt of proposed exhibit.
63.	Letter of Verbal Warning to Manuel Goncalves dated March 9, 2018, as introduced at the Contempt Hearing as Exhibit 39.	FRE 801-802 Hearsay FRE 401-402 Relevance FRE 403-Unfair Prejudice, confusing, misleading, needless presentation, etc. FRE 404 – Char. Evid.  Reserve the right to further object upon receipt of proposed exhibit.
64.	Defendant Skinner Services, Inc.’s Answers to Plaintiffs’ First Set of Interrogatories.	FRE 801-802 Hearsay FRE 401-402 Relevance

		Reserve the right to further object upon receipt of proposed exhibit.
65.	Defendant Thomas Skinner's Answers to Plaintiffs' First Set of Interrogatories.	FRE 801-802 Hearsay FRE 401-402 Relevance Reserve the right to further object upon receipt of proposed exhibit.
66.	Defendant David Skinner's Answers to Plaintiffs' First Set of Interrogatories.	FRE 801-802 Hearsay FRE 401-402 Relevance Reserve the right to further object upon receipt of proposed exhibit.
67.	Defendant Sandro Santos's Answers to Plaintiffs' First Set of Interrogatories.	FRE 801-802 Hearsay FRE 401-402 Relevance Reserve the right to further object upon receipt of proposed exhibit.
68.	Defendant Elber Diniz's Answers to Plaintiffs' First Set of Interrogatories.	FRE 801-802 Hearsay FRE 401-402 Relevance Reserve the right to further object upon receipt of proposed exhibit.
69.	Defendant Skinner Services, Inc.'s Responses to Special Interrogatories.	FRE 801-802 Hearsay FRE 401-402 Relevance Reserve the right to further object upon receipt of proposed exhibit.
70.	Defendant Thomas Skinner's Response to Special Interrogatories.	FRE 801-802 Hearsay FRE 401-402 Relevance Reserve the right to further object upon receipt of proposed exhibit.

71.	Defendant David Skinner's Response to Special Interrogatories.	FRE 801-802 Hearsay FRE 401-402 Relevance Reserve the right to further object upon receipt of proposed exhibit.
72.	Defendant Sandro Santos's Responses to Special Interrogatories.	FRE 801-802 Hearsay FRE 401-402 Relevance Reserve the right to further object upon receipt of proposed exhibit.
73.	Defendant Elber Diniz's Responses to Special Interrogatories.	FRE 801-802 Hearsay FRE 401-402 Relevance Reserve the right to further object upon receipt of proposed exhibit.
74.	Plaintiff Jose Pineda's Answer to Defendant Skinner Services' First Set of Interrogatories.	FRE 801-802 Hearsay FRE 401-402 Relevance Reserve the right to further object upon receipt of proposed exhibit.
75.	Plaintiff Jose Montenegro's Answer to Defendant Skinner Services' First Set of Interrogatories.	FRE 801-802 Hearsay FRE 401-402 Relevance Reserve the right to further object upon receipt of proposed exhibit.
76.	Plaintiff Marco Lopez's Answer to Defendant Skinner Services' First Set of Interrogatories.	FRE 801-802 Hearsay FRE 401-402 Relevance Reserve the right to further object upon receipt of proposed exhibit.
77.	Plaintiff Jose Hernandez's Answer to Defendant Skinner Services' First Set of Interrogatories.	FRE 801-802 Hearsay FRE 401-402 Relevance

		Reserve the right to further object upon receipt of proposed exhibit.
78.	Opt-in Plaintiffs' Answers to Defendant Skinner Services' First Set of Interrogatories.	FRE 801-802 Hearsay FRE 401-402 Relevance  Reserve the right to further object upon receipt of proposed exhibit.
79.	Application for Criminal Complaint as to David N Skinner Jr., Application No. 13-1260.	FRE 801-802 Hearsay FRE 401-402 Relevance FRE 403-Unfair Prejudice, confusing, misleading, needless presentation, etc. FRE 404 – Char. Evid. FRE 609-Improper Impeachment FRE 901-Auth.  Reserve the right to further object upon receipt of proposed exhibit.
80.	Excerpts from Defendant Skinner Services, Inc.'s Supplemental Answers to Plaintiffs' First Set of Interrogatories.	FRE 801-802 Hearsay FRE 401-402 Relevance  Reserve the right to further object upon receipt of proposed exhibit.
81.	Excerpts from Plaintiff Lopez's Text Messages. SP 497-512.	FRE 801-802 Hearsay FRE 901 Auth.  Reserve the right to further object upon receipt of proposed exhibit.
82.	EEOC Charge and Probable Cause Determination, SP 00584-00585, 00594, 00644-00645.	FRE 801-802 Hearsay FRE 401-402 Relevance FRE 403-Unfair Prejudice, confusing, misleading, needless presentation, etc. FRE 404 – Char. Evid. FRE 901-Auth.



		Reserve the right to further object upon receipt of proposed exhibit.
83.	Department of Labor – Personal Interview Statements, SP 12096-12097, 12116-12119, 12122-12123, 12135-12136, 12139-12143, 12148-12152, 12155-12159.	FRE 801-802 Hearsay FRE 401-402 Relevance FRE 403-Unfair Prejudice, confusing, misleading, needless presentation, etc. FRE 404 – Char. Evid. FRE 901-Auth.  Reserve the right to further object upon receipt of proposed exhibit.
84.	Documents related to Attorney General’s investigation into Skinner Services, SP04523-04929.	FRE 801-802 Hearsay FRE 401-402 Relevance FRE 403-Unfair Prejudice, confusing, misleading, needless presentation, etc. FRE 404 – Char. Evid. FRE 901-Auth.  Reserve the right to further object upon receipt of proposed exhibit.
85.	Discipline Issued to Plaintiffs Lopez, Gonzalez, Hernandez, and Pineda. SK000006, 000009, 000011-000012, 000014-000016, 000028, 000033, 000416-000419, 004813; Plaintiff Depo. Ex. 63.	No objections.
86.	Chalk(s) summarizing Defendants’ payroll, calendars, and timekeeping records pursuant to inter alia FRE 1006.	FRE 801-Hearsay FRE 401-402 Relevance FRE 901- Auth FRE 403-Unfair Prejudice, confusing, misleading, needless presentation, etc. FRE 602-Foundation/Pers. Knowledge  Reserve the right to further object upon receipt of proposed exhibit.

Respectfully submitted,

**SKINNER SERVICES, INC., d/b/a  
SKINNER DEMOLITION,  
THOMAS SKINNER, DAVID  
SKINNER, ELBER DINIZ and  
SANDRO SANTOS,**  
By their attorneys,

/s/ Michael B. Cole

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aceto@acetolegal.com  
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Michael B. Cole (BBO No. 679596)  
mcole@acetolegal.com  
**ACETO, BONNER & COLE, P.C.**  
One Liberty Square, Suite 410  
Boston, MA 02109  
(617) 728-0888